

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC. PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION <hr/> THIS DOCUMENT RELATES TO: ETHICON WAVE 4 CASES LISTED IN EXHIBIT A	Master File No. 2:12-MD-02327 MDL No. 2327 JOSEPH R. GOODWIN U.S. DISTRICT JUDGE
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**PLAINTIFFS' MOTION TO LIMIT THE OPINIONS AND TESTIMONY OF KIM
GEISINGER, M.D.**

Plaintiffs, in actions listed on attached Exhibit A, pursuant to Federal Rule of Evidence 702, 403, 104 and *Daubert v Merrell Dow Pharm., Inc.*, 509 U.S. 579 (1993) and its progeny, hereby submit Plaintiffs' Motion to Limit the Opinions and Testimony of Kim Geisinger, M.D. Defendants have designated Dr. Geisinger to offer general causation opinions on pathology as related to their mesh products despite the fact that Dr. Geisinger is offering opinions that are: (a) speculative and unsupported by sound methodology. The Court should exclude certain opinions of Dr. Geisinger for the reasons more fully explained in the accompanying Memorandum. Plaintiffs also rely on the following attached exhibits:

1. A copy of all cases to which this Motion applies is attached hereto as **Exhibit A**.
2. A true and correct copy of the Expert Report of Kim Geisinger, M.D. is attached hereto as **Exhibit B**.
3. A true and correct copy of the Curriculum Vitae: Kim R. Geisinger, M.D. is attached hereto as **Exhibit C**.

4. A true and correct copy of the Kim Geisinger, General Reliance List in Addition to Materials Referenced in Report is attached hereto as **Exhibit D**.

As set forth in Plaintiffs' Memorandum of Law in Support of Motion to Limit the Opinions and Testimony of Kim Geisinger, M.D., Plaintiffs request the Court grant this Motion in its entirety thereby excluding or limiting the testimony of Dr. Geisinger.

Dated: April 13, 2017

Respectfully submitted,

By: /s/ John R. Crone
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CERTIFICATE OF SERVICE

I hereby certify that on April 13, 2017, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system, which will send notification of such filing to the CM/ECF participants registered to receive services in this MDL.

/s/ John R. Crone

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